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April 18, 2013

Mr. Michael Robertson, P.E.
Program Manager
Gas Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Robertson:

The staff of the Consumer Protection and Safety Division (CPSD) of the California Public Utilities Commission conducted a General Order (GO) 112-E compliance inspection of Southern California Gas Company's (SoCalGas) Inland Distribution Region (Region) from October 8-19, 2012. The audit included a review of the Region's records from the period of November 2011 to October 2012 and random inspections of pipeline facilities. CPSD staff also reviewed the Region's Operator Qualification records, which included field observation of randomly-selected individuals performing covered tasks.

In your letter dated March 21, 2013 and received on March 22, 2013, you attach a Summary of Audit Findings, which identifies probable violations of GO 112-E Reference Title 49 of the Code of Federal Regulations (CFR), Part 192, and request a written response within thirty days of our receipt indicating corrective actions taken by SoCalGas. Attached, is our written response and proposed corrective actions.

SoCalGas looks forward to working with you and your staff to resolve these audit findings and any other concerns you might have. Please feel free to contact me at the number above or Troy Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "W. Jeff Koskie".

W. Jeff Koskie
Pipeline Safety and Compliance Manager

Attachments

Cc: Jerry Palo Jr., SED/GSRB
Adriana Crasnean, SED/GSRB
Michelle Wong, SED/GSRB

Attachment 1
Response to Audit Findings

Audit Finding

1. Title 49 CFR § 192.605 Procedural manual for operations, maintenance, and emergencies

Per SoCalGas procedures 189.005, Section 3.3.2.3 requires recording of the instrument used during odorization test on the SoCalGas Form 3991 "Odor Intensity Report." However, Work Order #52000342781 and #52000373136 completed by two technicians of the Chino District did not identify which equipment was used during the test for odor intensity. SoCalGas form 3991 was not used as required by SoCalGas Procedure 189.005. Therefore the Region is in violation of GO112-E Reference Title 49 CFR 192.605(a).

Response

The electronic version of Form 3991 in Click Mobile (See Attachment 2) has mandatory fields that need to be filled in before the electronic order can be completed, including the instrument number. These numbers were entered by our technicians, but due to an error in the program, they did not transfer to the SAP database where we retrieved the data to provide to staff. A bulletin was issued on October 15, 2012 (Attachment 2) to advise employees of the error and corrective action.

The version of Gas Standard 189.005 in use at the time of the audit did not reference the Electronic form. The current version (See Attachment 3, Bulletin Summary) addresses this process.

Chino base solely had one Odorometer in use from August 13, 2009 to the present. Therefore, we know the unit used on both inspections was CT # 65624. We are confident this number was entered into the Electronic form by our technicians, because our system would not have allowed the technicians to close or complete the electronic orders without first entering that number.

Corrective Action

As mentioned above, all corrective actions have already taken place. The Gas Standard was revised on March 15, 2013 to indicate that the electronic equivalent of Form 3991 is used to document the instrument number. In addition, a bulletin was issued on October 15, 2012, to address the system error and corrective actions.

Although the equipment number was not included in the SAP Report provided to Commission staff during the audit, the information necessary to identify the equipment used was available. Accordingly, pipeline safety and integrity was at no time compromised. No further corrective actions are planned.

Audit Finding

2. Title 49 CFR §192.805 – Qualification Program

SoCalGas' Pipeline Valve Inspection records showed two non-qualified individuals completing two work orders for valve inspections. These two work orders were WO#520000251844 for valve #41163-13 and WO#520000341508 for valve #41-13-5. The Region was not able to provide their qualifications for this covered task and the work orders were completed and approved by these two individuals. Although the Region's timesheets demonstrated that another qualified individual was at the approximate locations at the time of the inspections, the signees of the work orders are still considered responsible for the covered tasks. Therefore, the Region is in Violation of GO-112-E, Reference Title CFR 49 192.805.

Response

Title 192.805 (c) states, "Each operator shall have and follow a written qualification program. The program shall include provisions to: allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified." In this case, the Lead Construction Technician, who possesses the proper qualification, was on the job site, along with the Construction Technician whose name appears on the report generated by SAP. In these two cases, it was necessary to review both the SAP report and the associated timesheet to confirm that a qualified individual was involved in the operation.

SoCalGas always assigns the valve inspection for distribution to a two-man crew. The statement in the audit finding that the qualified employee was "at the approximate location" is not accurate. The qualified individual was at the valve location and directly observed the inspection as it was being conducted.

Corrective Action

As indicated in the audit report, SoCalGas provided staff with the names and qualifications of the individuals involved in performing the covered tasks of these two-person operations. SoCalGas' two-person crew complied with GO-112-E, Reference Title CFR 49 192.805, which requires qualified employees to perform covered tasks, or non-qualified employees to work under the direction and observation of a qualified individual. Section 192.805 does not require that the person qualified to perform the covered task be the person who enters the data for work being performed. Typically, the individual entering information into the database is the lead employee on the crew, which is what occurred in this case.

Accordingly, no violation occurred and no corrective action is necessary.

OBSERVATION

There were 18 odorization test records, out of 44 reviewed, that did not indicate the address for the test location. Even though test points are configured differently from regular meter set assemblies and easily identified by qualified individuals, the street address should be included in the records to avoid any confusion.

RESPONSE

The master list provided to the Commission during the audit is copied below. Most every inspection point does use a house number. However, where that information would not serve useful in locating the gas facility for the test, other descriptive information is used.

Beaumont does not list an address because the house and street number that the meter set assembly serves is not visible from the roadway. A qualified individual sent to perform the odorant inspection at this location would not find the assembly based on the house address.

District	ID	Location
Azusa	LV2001M	1370 Canyon View Dr, La Verne
Beaumont	BEAU2000M	Avenida Miravilla n/o Whispering Pines, Beaumont
Chino	CHHL4000-02M-2	5691 Gates St, Chino Hills
Chino	CHHL40004002M	6014 Crest Dr., Chino Hills
Corona	NOR2000M	4189 Pedley Ave., Norco
El Centro	BRLY60002M	335 W. Legion Rd, Brawley
Fontana	FNT40004002M-2	1645 N Acacia Ave., Rialto
Fontana	FONT40004002M	15854 Sierra Lakes Pkwy, Fontana
Murrieta	ELSN2000102710	28997 11th St, Lake Elsinore
Palm Desert	PD20002001M	119 Tepin Way, Palm Desert
Ramona	HEM10272825	4830 Dusky Wing Dr., Hemet
Rim Forest	GVL40004002M	33103 Holcomb Creek Dr., Green Valley Lake
Riverside	RIVR20015000M	4510 Rutile St., Riverside
Riverside	RIVR2001M-1	4290 SOTO ST, Riverside
San Bernardino	WW235335M	1995 Mojave Scenic Dr., Wrightwood
Yucca	2920002001M	74635 Morning Dr., 29 Palms
Yucca	2920002001M-1	74677 Morning Dr., Yucca Valley

Attachment 2
Clickmobile Interim Process

CLICKMOBILE INTERIM PROCESS:	No.	MIP-1204-SCG
Subject: Odor Intensity Test Apparatus Used	Effective	10/15/2012
Contact Person: Gas Operations Services	Phone:	213-244-5483

IMPACTED ORGANIZATIONS: Distribution Operations, Tech Services

PURPOSE: The purpose of this document is to provide instructions on the use of a ClickMobile Form or an associated Smart PDF. This supercedes any previous instructions.

BACKGROUND: When completing an Odor Intensity Test order, the "Apparatus Used" and "Apparatus CT or ID#" are required fields. We have recently found that these fields are not always processed correctly by Click to SAP and this data is missing in SAP. This issue is currently being addressed and will be resolved soon.

REQUIRED ACTION: When completing orders in ClickMobile, in addition to completing the "Apparatus Used" and "Apparatus CT or ID#" fields, the Field Tech will need to enter the Apparatus information for BOTH fields in text in the "Remarks" field on the "General Work Details" tab. Do NOT check the General Work Details update box as the information entered will automatically populate in SAP.

Please see the 2 screen shots below:

FunctionalLocation Form

Odor Intensity Test

Odor Intensity

*Apparatus Used
Bacharach-Odorometer

*Apparatus CT or ID#
AT603

These two mandatory fields do not map correctly to SAP,
They must however, be filled out to complete the form.

Basic Source of Gas Supply (Line No., OM No., etc.)	% of Gas in Air When Gas is First Readily Detectable	Odor Intensity at 0.9% Gas in Air	Odor Intensity Out of Tolerance
SL 41-12	0.09	4 - Strong odor	<input type="checkbox"/> Notified Supervisor

NOTE: If odor intensity is 1, 2, or 5, immediately contact local responsible supervisor.

Test Time: 03/28/2011 13:28:25

OK Cancel


Gas General Work Details	<div>General Work Details</div>	
Special Tools/Equipment	Work Order	SAP-PM52000028386110
	Work Type	ODORANT INTENSITY TEST SCG
Permits/Prerequisites	District	PALM DESERT
	Thomas Bros.	TB-
Attachments	Atlas/Plot/Facility	
	Address	75095 Mayfair Dr.
Facility	Cross Street	City Palm Desert
	Loc.	Lat. 33742974 Lon -118353716
Completion	Special Instructions	
	<p>Do NOT check the General Work Details checkbox.</p> <p><input type="checkbox"/> General Work Details (Indicate(s))</p> <p>General Work Detail Update(s) Remarks</p> <p>Bacharach Odorometer used for this test CT #AT603.</p> <p>Detailed Order Instructions</p>	

Enter Apparatus Used and CT number of the equipment in the General Work Details "Remarks" field.

If you have any questions regarding this bulletin, please contact ESS at 213-244-4470

Attachment 3
Operation of Odorometer and Odorator
Document Profile Summary



A  Semptra Energy utility

GAS STANDARD

OPERATION OF ODOROMETER AND ODORATOR	SCG: 189.005
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Brief: 2013-03-15

Section 3.1.4 was created to acknowledge Click Mobile as an approved system to record odor intensity test results. Section 5.1 was changed to indicate where to store Odorometer calibration records. Section 7.1 indicates that Click Mobile are stored in SAP and kept for 5 yrs

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If Merged, Merged To Document Number:	
Utility:	SoCalGas
Department:	EAC
Number of Common Document (if applicable):	G8130
Contains OPQUAL Covered Task:	Yes
Part of SoCalGas O&M Plan:	No
Part of SDG&E O&M Plan:	No
O&M 49 CFR Codes & Impacted Sections of Document:	
Part of Non-O&M Parts 191-193 Plan	No
Non-O&M 49 CFR Codes & Impacted Sections of Document	
Part of Distribution IMP (DIMP)	No
DIMP 49 CFR Codes & Impacted Sections of Document:	
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